

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**DOCKETED**

AUG 22 2001

CHRISTOPHER T. O'NEILL and  
P. KEVIN DONAHUE,

Plaintiffs,

v.

CITY OF CHICAGO POLICE OFFICERS  
J. O'CALLAGHAN (Star No. 18573) and  
L. SYAS (Star No. 19154); and  
BUTCH MCGUIRE'S, INC.

Defendants.

No.

JURY DEMANDED

JUDGE HOLDERMAN

**01C 6500**  
MAGISTRATE JUDGE ROSEMOND

COMPLAINT

Plaintiffs, Christopher T. O'Neill and P. Kevin Donahue, by and through their attorneys, James E. Dahl and Paul N. Bonadies, state by way of Complaint against defendants, City of Chicago Police Officers J. O'Callaghan (Star No. 18573) and L. Syas (Star No. 19154), and Butch McGuire's, Inc., as follows:

Parties

1. Plaintiff, Christopher T. O'Neill ("O'Neill") is a resident of Portland, Oregon.
2. Plaintiff, P. Kevin Donahue ("Donahue") is, and at all times relevant to this cause of action was, a resident of Cook County, Illinois.
3. Defendant, J. O'Callaghan is, and at times relevant to this cause of action was, a Chicago police officer residing in Cook County, Illinois.
4. Defendant, L. Syas is, and at times relevant to this cause of action was, a Chicago police officer residing in Cook County, Illinois.

5. Defendant, Butch McGuire's, Inc. ("Butch McGuire's") is, and at all times relevant to cause of action was, an Illinois corporation operating a bar and restaurant located in Chicago, Illinois and known as Butch McGuire's Tavern.

Jurisdiction and Venue

6. This action arises under the United States Constitution, particularly under the Fourth and Fourteenth Amendments to the Constitution of the United States and under Federal law, particularly the Civil Rights Act 42 U.S.C. §1983. This Court has jurisdiction in this action pursuant to 28 U.S.C. §§1331 and 1343 and supplemental jurisdiction to hear pendant claims under state law pursuant to 28 U.S.C. §1367(a).

7. This Court is the appropriate venue within which to adjudicate this dispute because the defendants reside in this District and the occurrence at issue occurred in this District.

Background

8. On December 31, 2000, plaintiffs O'Neill and Donahue were sitting at a table at Butch McGuire's Tavern and were accompanied by three friends.

9. While sitting at the table, a waitress brought a beer to the plaintiffs' table. Plaintiff O'Neill informed the waitress that no one had ordered the beer and that no one at the table wanted the beer.

10. The waitress insisted that plaintiff O'Neill pay for the beer and when plaintiff O'Neill informed the waitress that he was not going to pay for the beer, the waitress ushered a bouncer to the table, who was employed by defendant Butch McGuire's, to try to resolve the situation.

11. The bouncer brought defendant O'Callaghan to the table and at that time, plaintiff O'Neill explained to defendant O'Callaghan that no one at the table had ordered the beer and that no one wanted the beer.

12. Defendant O'Callaghan then told plaintiff O'Neill that he should walk outside the bar to discuss the situation further. Plaintiffs O'Neill and Donahue walked outside of defendant Butch McGuire's and as soon as plaintiff O'Neill was outside of the bar, defendants O'Callaghan and Syas threw O'Neill against the window of Butch McGuire's, violently handcuffed him, searched his person and arrested plaintiff O'Neill.

13. When plaintiff Donahue asked defendant O'Callaghan why plaintiff O'Neill was being arrested, defendant O'Callaghan told plaintiff Donahue to step inside Butch McGuire's and he would explain.

14. As soon as plaintiff Donahue stepped inside defendant Butch McGuire's, plaintiff Donahue was arrested by defendants O'Callaghan and Syas.

15. At no time did either plaintiff O'Neill or plaintiff Donahue violate any federal, state or municipal statute.

16. The defendants, O'Callaghan and Syas, arrested the plaintiffs without probable cause and without an arrest warrant and charged the plaintiffs with criminal trespass.

17. Defendants O'Callaghan and Syas were at all times relevant to this action, officers, employees and/or agents of the Chicago Police Department, acting under color of law, under color of statutes, ordinances, regulations, policies, customs and usages of the State of Illinois and/or the City of Chicago and/or the Chicago Police Department.

18. The plaintiffs spent the entire evening in jail and the next day, the criminal proceedings against the plaintiffs were terminated in their favor.

COUNT I

O'NEILL v. O'CALLAGHAN AND SYAS

VIOLATION OF CIVIL RIGHTS

1-18. Plaintiff O'Neill realleges paragraphs 1 through 18 above as paragraphs 1 through 18 of this Count I.

19. As a direct and proximate result of the actions of defendants O'Callaghan and Syas, plaintiff O'Neill suffered the following injuries and damages:

a. violation of his constitutional rights under the Fourth and Fourteenth Amendments to the Constitution of the United States of America to be free from unreasonable search and seizure, the right to due process and equal protection under the laws;

b. deprivation of physical liberty;

c. physical pain and suffering and emotional trauma, distress and suffering arising from the arrest, incarceration and criminal charge.

20. Defendants O'Callaghan's and Syas' misconduct was the proximate cause of the violation of plaintiff O'Neill's Fourth and Fourteenth Amendment rights under the U.S. Constitution when they unreasonably searched, seized and arrested O'Neill without probable cause.

21. Defendants O'Callaghan and Syas violated plaintiff O'Neill's U.S. Constitution Fourteenth Amendment rights by depriving him of his liberty without due

process of law and denying his protection of the laws by arresting him and by causing false criminal charges to be brought against him.

WHEREFORE, plaintiff, Christopher T. O'Neill, respectfully requests this Court to enter judgment in his favor and against defendants, J. O'Callaghan and L. Syas, jointly and severally, in an amount greater than \$75,000 plus attorney's fees and costs pursuant to 42 U.S.C. §1988, punitive damages and such other relief as this Court deems appropriate.

## COUNT II

### DONAHUE v. O'CALLAGHAN AND SYAS

#### VIOLATION OF CIVIL RIGHTS

1-18. Plaintiff Donahue realleges paragraphs 1 through 18 of Count I as paragraphs 1 through 18 of this Count II.

19. As a direct and proximate result of the actions of defendants O'Callaghan and Syas, plaintiff Donahue suffered the following injuries and damages:

- a. violation of his constitutional rights under the Fourth and Fourteenth Amendments to the Constitution of the United States of America to be free from unreasonable search and seizure, the right to due process and equal protection under the laws;
- b. deprivation of physical liberty;
- c. physical pain and suffering and emotional trauma, distress and suffering arising from the arrest, incarceration and criminal charge.

20. Defendants O'Callaghan's and Syas' misconduct was the proximate cause of the violation of plaintiff Donahue's Fourth and Fourteenth Amendment rights under the U.S. Constitution when they unreasonably searched, seized and arrested Donahue without probable cause.

21. Defendants O'Callaghan and Syas violated plaintiff Donahue's Constitution Fourteenth Amendment rights by depriving him of his liberty without due process of law and denying his protection of the laws by arresting the plaintiff and by causing false criminal charges to be brought against Donahue.

WHEREFORE, plaintiff, P. Kevin Donahue, respectfully requests this Court to enter judgment in his favor and against defendants, J. O'Callaghan and L. Syas, jointly and severally, in an amount greater than \$75,000 plus attorney's fees and costs pursuant to 42 U.S.C. §1988, punitive damages and such other relief as this Court deems appropriate.

### COUNT III

#### O'NEILL v. O'CALLAGHAN AND SYAS

#### MALICIOUS PROSECUTION

1-18. Plaintiff O'Neill realleges paragraphs 1 through 18 of Count I as paragraphs 1 through 18 of this Count III.

19. Defendants O'Callaghan and Syas, willfully and wantonly, falsely accused plaintiff O'Neill of criminal trespass and then intentionally, falsely detained, arrested and imprisoned plaintiff O'Neill against his will.

20. As a direct and proximate result of the aforementioned conduct, plaintiff O'Neill was exposed to public disgrace, physical harm, humiliation, mental anguish, emotional harm and incurred expenses in defending the false charges of criminal trespass.

21. By virtue of defendant O'Callaghan's and Syas' intentional conduct, defendants O'Callaghan and Syas are subject to punitive damages.

WHEREFORE, plaintiff, Christopher T. O'Neill, respectfully requests this Court to enter judgment in his favor and against defendants, J. O'Callaghan and L. Syas, jointly and severally, in an amount greater than \$75,000 plus attorney's fees, costs and punitive damages.

#### COUNT IV

#### DONAHUE v. O'CALLAGHAN AND SYAS

#### MALICIOUS PROSECUTION

1-18. Plaintiff Donahue realleges paragraphs 1 through 18 of Count I as paragraphs 1 through 18 of this Count IV.

19. Defendants O'Callaghan and Syas, willfully and wantonly, falsely accused plaintiff Donahue of criminal trespass and then intentionally, falsely detained, arrested and imprisoned plaintiff Donahue against his will.

20. As a direct and proximate result of the aforementioned conduct, plaintiff Donahue was exposed to public disgrace, physical harm, humiliation, mental anguish, emotional harm and incurred expenses in defending the false charges of criminal trespass.

21. By virtue of defendants O'Callaghan's and Syas' intentional conduct, defendants O'Callaghan and Syas are subject to punitive damages.

WHEREFORE, plaintiff, P. Kevin Donahue, respectfully requests this Court to enter judgment in his favor and against defendants, J. O'Callaghan and L. Syas, jointly and severally, in an amount greater than \$75,000 plus attorney's fees, costs and punitive damages.

COUNT V

O'NEILL v. O'CALLAGHAN AND SYAS

FALSE ARREST AND FALSE IMPRISONMENT

1-18. Plaintiff O'Neill realleges paragraphs 1 through 18 of Count I as paragraphs 1 through 18 of this Count V.

19. Plaintiff O'Neill was arrested, restrained and imprisoned without any probable cause that he committed any sort of criminal offense.

20. Defendants O'Callaghan's and Syas' actions were willful and wanton in that they were meant to intimidate, harass and disgrace plaintiff O'Neill.

21. As a direct and proximate result of the aforementioned conduct of defendants O'Callaghan and Syas, plaintiff O'Neill was humiliated, suffered bodily injury, mental anguish and incurred expenses to defend the unjustified charges brought against him.

22. By virtue of defendants O'Callaghan's and Syas' intentional actions, defendants O'Callaghan's and Syas' are subject to punitive damages.



WHEREFORE, plaintiff, Christopher T. O'Neill, respectfully requests this Court to enter judgment in his favor and against defendants, J. O'Callaghan and L. Syas, jointly and severally, in an amount greater than \$75,000 plus attorney's fees, costs and punitive damages.

COUNT VI

DONAHUE v. O'CALLAGHAN AND SYAS  
FALSE ARREST AND FALSE IMPRISONMENT

1-18. Plaintiff Donahue realleges paragraphs 1 through 18 of Count I as paragraphs 1 through 18 of this Count VI.

19. Plaintiff Donahue was arrested, restrained and imprisoned without any probable cause that he committed any sort of criminal offense.

20. Defendants O'Callaghan's and Syas' actions were willful and wanton in that they were meant to intimidate, harass and disgrace plaintiff Donahue.

21. As a direct and proximate result of the aforementioned conduct of defendants O'Callaghan and Syas, plaintiff Donahue was humiliated, suffered bodily injury, mental anguish and incurred expenses to defend the unjustified charges brought against him.

22. By virtue of defendants O'Callaghan's and Syas' intentional actions, defendants O'Callaghan and Syas are subject to punitive damages.

WHEREFORE, plaintiff, P. Kevin Donahue, respectfully requests this Court to enter judgment in his favor and against defendants, J. O'Callaghan and L. Syas, jointly

and severally, in an amount greater than \$75,000 plus attorney's fees, costs and punitive damages.

COUNT VII

O'NEILL v. BUTCH MCGUIRE'S

MALICIOUS PROSECUTION

1-18. Plaintiff O'Neill realleges paragraphs 1 through 18 of Count I as paragraphs 1 through 18 of this Count VII.

19. Plaintiff O'Neill, was a patron of Butch McGuire's Tavern which was owned and operated by defendant Butch McGuire's, Inc.

20. The bouncers for Butch McGuire's Tavern were employed by defendant Butch McGuire's.

21. Defendant, Butch McGuire's, by and through its employees, willfully and wantonly falsely accused plaintiff O'Neill of criminal trespass and in a willful and wanton manner allowed for plaintiff O'Neill to be falsely detained, arrested and imprisoned against his will.

22. As a direct and proximate result of the aforementioned detention, arrest and imprisonment of plaintiff O'Neill, plaintiff O'Neill was exposed to humiliation, mental anguish, bodily harm and was forced to incur the expense of defending unjustified criminal charges that were brought against him.

23. By reason of Butch McGuire's, Inc.'s willful and wanton conduct, Butch McGuire's is subject to punitive damages.

WHEREFORE, plaintiff, Christopher T. O'Neill, respectfully requests this Court to enter judgment in his favor and against defendant, Butch McGuire's, Inc., in an amount greater than \$75,000 plus attorney's fees, costs and punitive damages.

COUNT VIII

DONAHUE v. BUTCH MCGUIRE'S

MALICIOUS PROSECUTION

1-18. Plaintiff Donahue realleges paragraphs 1 through 18 of Count I as paragraphs 1 through 18 of this Count VIII.

19. Plaintiff Donahue, was a patron of Butch McGuire's Tavern which was owned and operated by defendant Butch McGuire's, Inc.

20. The bouncers for Butch McGuire's Tavern were employed by defendant Butch McGuire's.

21. Defendant, Butch McGuire's, by and through its employees, willfully and wantonly falsely accused plaintiff Donahue of criminal trespass and in a willful and wanton manner allowed for plaintiff Donahue to be falsely detained, arrested and imprisoned against his will.

22. As a direct and proximate result of the aforementioned detention, arrest and imprisonment of plaintiff Donahue, plaintiff Donahue was exposed to humiliation, mental anguish, bodily harm and was forced to incur the expense of defending unjustified criminal charges that were brought against him.

23. By reason of Butch McGuire's, Inc.'s willful and wanton conduct, Butch McGuire's is subject to punitive damages.

WHEREFORE, plaintiff, P. Kevin Donahue, respectfully requests this Court to enter judgment in his favor and against defendant, Butch McGuire's, Inc., in an amount greater than \$75,000 plus attorney's fees, costs and punitive damages.

COUNT IX

O'NEILL v. BUTCH MCGUIRE'S

FALSE ARREST AND FALSE IMPRISONMENT

1-18. Plaintiff O'Neill realleges paragraphs 1 through 18 of Count I as paragraphs 1 through 18 of this Count IX.

19. Defendant, Butch McGuire's, by and through its employees, maliciously intended to injure, humiliate and disgrace plaintiff O'Neill by causing him to be arrested and imprisoned by directing defendants O'Callaghan and Syas to arrest plaintiff O'Neill without probable cause and charging O'Neill with the crime of criminal trespass.

20. As a direct and proximate result of the detention, arrest and imprisonment which was directed by Butch McGuire's, plaintiff O'Neill was humiliated, incurred mental anguish, bodily injury, and incurred costs to defend and establish his innocence with respect to the false charge of criminal trespass.

21. As a direct and proximate result of defendant Butch McGuire's conduct, Butch McGuire's is subject to punitive damages.

WHEREFORE, plaintiff, Christopher T. O'Neill, respectfully requests this Court to enter judgment in his favor and against defendant, Butch McGuire's, Inc., in an amount greater than \$75,000 plus attorney's fees, costs and punitive damages.

COUNT X

DONAHUE v. BUTCH MCGUIRE'S  
FALSE ARREST AND FALSE IMPRISONMENT

1-18. Plaintiff Donahue realleges paragraphs 1 through 18 of Count I as paragraphs 1 through 18 of this Count X.

19. Defendant, Butch McGuire's, by and through its employees, maliciously intended to injure, humiliate and disgrace defendant Donahue by causing him to be arrested and imprisoned by directing defendants O'Callaghan and Syas to arrest plaintiff Donahue without probable cause and charging Donahue with the crime of criminal trespass.

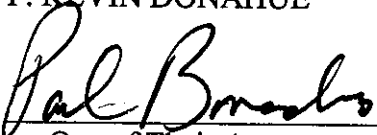
20. As a direct and proximate result of the detention, arrest and imprisonment which was directed by Butch McGuire's, plaintiff Donahue was humiliated, incurred mental anguish, bodily injury, and incurred costs to defend and establish his innocence with respect to the false charge of criminal trespass.

21. As a direct and proximate result of defendant Butch McGuire's conduct, Butch McGuire's is subject to punitive damages.

WHEREFORE, plaintiff, P. Kevin Donahue, respectfully requests this Court to enter judgment in his favor and against defendant, Butch McGuire's, Inc., in an amount greater than \$75,000 plus attorney's fees, costs and punitive damages.

JAMES E. DAHL (0568724)  
PAUL N. BONADIES (6206589)  
JAMES E. DAHL & ASSOCIATES  
225 West Washington Street, Suite 1125  
Chicago, IL 60606  
312/641-3245

CHRISTOPHER T. O'NEILL  
and P. KEVIN DONAHUE

By:   
One of Their Attorneys

JS 44  
(Rev. 12/96)

## CIVIL COVER SHEET

01C 6500

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

## I. (a) PLAINTIFFS

Christopher T. O'Neill and  
P. Kevin Donahue

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF Portland, Oregon  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

James E. Dahl & Associates  
225 West Washington St., #1125  
Chicago, IL 60606

## DEFENDANTS

City of Chicago Police Officers  
J. O'Callaghan (Star No. 18573) and  
L. Syas (Star No. 19154); and  
Butch McGuire's, Inc.

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT Cook County, IL  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

ATTORNEYS (IF

DOCKETED

AUG 22 2001

## II. BASIS OF JURISDICTION

(PLACE AN "X" IN ONE BOX ONLY)

- ☐ 1 U.S. Government Plaintiff  
☒ 2 U.S. Government Defendant  
☒ 3 Federal Question (U.S. Government Not a Party)  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES

(For Diversity Cases Only)

(PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

- Citizen of This State ☐ 1 ☒ 2 Incorporated or Principal Place of Business In This State ☐ 4 ☒ 5  
Citizen of Another State ☒ 2 ☐ 3 Incorporated and Principal Place of Business In Another State ☐ 5 ☐ 6  
Citizen or Subject of a Foreign Country ☐ 3 ☐ 6 Foreign Nation ☐ 6 ☐ 7

## IV. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

## V. NATURE OF SUIT

(PLACE AN "X" IN ONE BOX ONLY)

CONTRACT	TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice Act <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input checked="" type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>HABEAS CORPUS:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	

## VI. CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.)

Violation of civil rights action pursuant to 42 U.S.C. §1983; malicious prosecution, false arrest, false imprisonment.

## VII. REQUESTED IN COMPLAINT

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 ☐

DEMAND \$greater than \$75,000.00 CHECK YES only if demanded in complaint JURY DEMAND: ☒ YES ☐ NO

VIII. This case ☒ is not a refiling of a previously dismissed action.

☐ is a refiling of case number \_\_\_\_\_, previously dismissed by Judge \_\_\_\_\_

DATE

August 21, 2001

SIGNATURE OF ATTORNEY OF RECORD

Paul Brinkley



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

DOCKETED

AUG 22 2001

01C 6500

In the Matter of

Christopher T. O'Neill and P. Kevin Donahue,

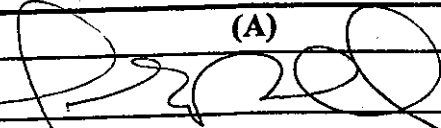
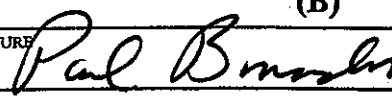
v.

City of Chicago Police Officers J. O'Callaghan  
(star No. 18573) and L. Syas (Star No. 19154);  
and Butch McGuire's, Inc.Case Number:  
MAGISTRATE JUDGE ROSEMOND

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR: Plaintiffs

CHRISTOPHER T. O'NEILL and P. KEVIN DONAHUE

JUDGE HOLDERMAN

(A)		(B)	
SIGNATURE 		SIGNATURE 	
NAME James E. Dahl		NAME Paul N. Bonadies	
FIRM JAMES E. DAHL & ASSOCIATES		FIRM JAMES E. DAHL & ASSOCIATES	
STREET ADDRESS 225 West Washington St., Suite 1125		STREET ADDRESS 225 West Washington St., Suite 1125	
CITY/STATE/ZIP Chicago, IL 60606		CITY/STATE/ZIP Chicago, IL 60606	
TELEPHONE NUMBER 312/641-3245	FAX NUMBER 312/641-1662	TELEPHONE NUMBER 312/641-3245	FAX NUMBER 312/641-1662
E-MAIL ADDRESS Dahlfirm@aol.com		E-MAIL ADDRESS Dahlfirm@aol.com	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 0568724		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6206589	
MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	
(C)		(D)	
SIGNATURE		SIGNATURE	
NAME		NAME	
FIRM		FIRM	
STREET ADDRESS		STREET ADDRESS	
CITY/STATE/ZIP		CITY/STATE/ZIP	
TELEPHONE NUMBER	FAX NUMBER	TELEPHONE NUMBER	FAX NUMBER
E-MAIL ADDRESS		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	